

IN THE MATTER OF

CHAPTER 7

Michael L. Galesky,

Debtor.

CASE NO. 20-25509 GMH

DEBTOR'S OBJECTION TO TRUSTEE'S SUPPLEMENTAL
APPLICATION TO EMPLOY COUNSEL

Now comes Michael L. Galesky, (the "Debtor") by and through his undersigned attorneys, and hereby objects to the Trustee's Supplemental Application to Employ Jane F. (Ginger) Zimmerman and Murphy Desmond, S.C. as Attorney for the Trustee, filed April 18, 2022 [Doc. 184] (the "Supplemental Application").

1. The Supplemental Application fails to provide any basis by which a determination can be made regarding whether or not the employment of counsel is, in fact, reasonably necessary for the protection and benefit of the estate.

2. The Supplemental Application simply states that "The Debtor [sic] has received an offer to purchase the claims of the estate that may have value to the bankruptcy estate." Supplemental Application, ¶ 5. However, the Supplemental Application fails: a) to describe the claims of the estate for which an offer to purchase has been made; b) to provide any detail regarding the consideration offered for the purchase of the claims; or c) to provide any description as to what analysis the Trustee has made regarding the claims and why the Trustee has not pursued such claims in the 18 months that this case has been pending.

3. Without any additional information, the Trustee's Supplemental Objection fails to state any grounds to determine whether the retention of counsel is reasonably necessary for the protection and benefit of the estate and, accordingly, should be denied.

Wherefore, the Debtor objects to the Trustee's Supplemental Application and requests that a hearing be set.

Dated this 2nd day of May, 2022.

HANSON & PAYNE, LLC
Attorneys for the Debtor

/s/ Bryan M. Becker
Bryan M. Becker

P.O. Address:
740 N. James Lovell St.
Milwaukee, Wisconsin 53233
(414) 271-4550 - Telephone
bbecker@hansonpayne.com - Email